

UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF NEW YORK

----- x  
GENERAL MOTORS CORPORATION and  
ADAM OPEL GmbH;

Plaintiffs,

- against -

: No. 08-CV-4999

: STIPULATION AND ORDER

FIAT S.p.A; FIAT AUTO HOLDING B.V.; and  
FIAT AUTO S.p.A.,

Defendants.

----- x

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned parties, through their respective counsel, that the date for Defendants Fiat S.p.A., Fiat Auto Holding B.V., and Fiat Auto S.p.A. to move, answer, or otherwise respond to the Complaint in this action shall be July 23, 2008; and

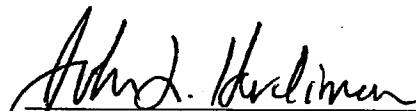
IT IS FURTHER STIPULATED AND AGREED that Defendants will not raise insufficient service of process as a defense in this action but reserve all other defenses, including, but not limited to, all jurisdictional defenses.

New York, New York

June 16, 2008



Roger B. Mead (RM2676)  
FOLGER LEVIN & KAHN LLP  
Embarcadero Center West  
275 Battery Street, 23<sup>rd</sup> Street  
San Francisco, CA 94111  
Phone: 415-986-2800  
Fax: 415-986-2827



John L. Hardiman (JH3872)  
SULLIVAN & CROMWELL LLP  
1 New Fetter Lane  
London EC4A 1AN  
England  
Phone: +44-20-7979-8900  
Fax: +44-20-7959-8950

Counsel for Plaintiffs General Motors  
Corporation and Adam Opel GmbH

-and-

125 Broad Street  
New York, New York 10004  
Phone: 212-558-4000  
Fax: 212-558-3588

Counsel for Defendants Fiat S.p.A., Fiat Auto  
Holding B.V., and Fiat Auto S.p.A.

SO ORDERED:

---

United States District Judge